

# **AREA PLAN GUIDANCE LANGUAGE**

**Chapter 6.95, California Health & Safety Code  
Title 19, Article 3, California Code of Regulations  
Minimum Standards for Area Plans**

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Prepared by the  
Stanislaus County  
Department of Environmental Resources,  
and  
LEPC Region IV Counties

## **SECTION 2720 - PROPOSED AREA PLAN**

The proposed area plan, as required by Section 25503(d) of the H&SC, shall include:

- (a) A description of the extent to which the AA has met the requirements of this Article, and a schedule for implementing the final area plan, within one year of the effective date of these regulations, to include the provisions of Sections 2722-2728 of this Article.
  - Describe specific actions taken to plan and coordinate area plan elements, resources and methodologies with law enforcement, fire, environmental health, OES and other agencies within the jurisdiction. A copy of jurisdictional agreements or signature pages indicating buy-in (with the area plan) can demonstrate commitment of other agencies by emergency response agencies.
  - Describe actions needed to update and implement area plan.
  - Describe area plan's relationship to other regional emergency plans and state Hazardous Material Plan. How do the plans tie together, what triggers use of larger plan and how is this done?
  - Describe the conditions that would activate the area plan elements (level 1,2, or 3) including the agencies involved. Identify the regulated substances (that would create the problem), the potential losses, release scenarios, elements of response, agencies involved and the resources necessary to mitigate the problem. Need to cover metropolitan or rural and fixed facility versus transportation.
- (b) Provisions for integrating, in the final area plan, information from business plans submitted by handlers within the jurisdiction of an AA.
  - Describe jurisdiction's process for collecting information from Business Plans and for updating information to ensure accuracy and completeness. Since accurate data is a basic building block to safe and effective emergency response incidents, it is critical that this component be thoroughly described in the plan.
  - Discuss how business information is distributed to emergency response agencies including the agencies involved, and the distribution frequency. Information must be provided in a format that is useful to the responders. User agencies need to be involved when changes are made to the format and content of the business information provided to them. How does the AA know that the information is getting to the right agencies (in the right hands), in a timely fashion and accurately?
  - Discuss AA's purpose (to minimize the impact of a release and mitigate anything that does happen, etc.) and procedures for integrating business information into area plan. The overall approach, with the business plan information at hand, should be to design emergency response in relation to the chemicals that you might have to deal with.

- Provide a map of the jurisdiction showing the location (but not facility name) of each facility (those that can create serious problems if a release occurs) handling large quantities of regulated substances. Many larger businesses have their own response groups and special equipment to handle situations presented by particular chemicals. This information should be included in the area plan discussion.
  - Based on information obtained from Risk Management Plans (RMP) received from facilities handling regulated substances within the county, identify areas (within county) that contain large quantities of gases (anhydrous ammonia, chlorine, sulfur dioxide, etc.) that present the greatest risk to the community if released into the atmosphere. Identify the closest response personnel, equipment and other resources available to these areas in the event of a release.
- (c) A form providing information on the elements within the area plan, substantially equivalent to the optional model reporting form for area plans.
- A checklist listing the elements of the area plan should serve to satisfy this subsection.

## **SECTION 2722 - PROCEDURES AND PROTOCOLS FOR EMERGENCY RESPONSE PERSONNEL**

Area plans shall include procedures and protocols to ensure the health and safety of emergency response personnel, such as, but not limited to:

- (a) Guidelines for approach, recognition, and evaluation of releases and threatened releases by emergency response personnel.
- Area plan should reference the statutes, regulations and plans emergency responders are expected to follow when approaching and actively involving themselves in incidents. Local protocols should be included where they are different from accepted ICS procedures.
  - Indicate who is responsible (usually IC) for identifying the type of release and determining the health and environmental impacts (usually IC based on recommendations from Tech Ref or environmental health personnel) from the incident.
- (b) Monitoring and decontamination guidelines for emergency response personnel and equipment.
- Guidelines should be specific and clearly identify those responsible for the monitoring and decontamination of emergency responders and equipment.

Guidelines should follow standard monitoring and decontamination practices, such as those prepared by CSTI, and describe in detail the process for medical monitoring and decontamination.

- Guidelines should include a generic diagram showing the location of decontamination equipment and personnel during decon activities, and a listing of the equipment (and backup equipment) needed for decon. The diagram included in the CSTI's Decon Course is highly recommended. Procedures should also be included for decontamination of responders, injured persons and the general public in the event of exposure.
- Guidelines should include medical monitoring criteria, a list of steps to be taken during response monitoring and post monitoring activities, and a list of medical monitoring equipment. The responsibilities of medical monitoring personnel should be delineated. It is highly recommended that the section "Medical Considerations" from CSTI's Decon Course be used as a reference in developing the criteria.

## **SECTION 2723 - PRE-EMERGENCY PLANNING**

Area plans shall include, but not be limited to:

- (a) Provision for pre-incident surveys of business sites by first responders for the purpose of site familiarization, if deemed necessary by the AA.
  - Completion of this plan element is optional for the AA. However, AA may want to obtain the standard protocol used by emergency responders to make pre-incident surveys of business sites and the relationship to incident response in the jurisdiction.
  - This subsection may also be important in describing the relationship between emergency responders and businesses as outlined in risk management programs completed under 40 CFR Part 68. For example, what agreements have been reached between local emergency responders and facility operators to address releases from these facilities? Is there an understanding of responsibilities on both sides? Who will have control over the incident and will site access be a problem?
- (b) Pre-emergency planning shall include coordination of emergency response and emergency assistance between contiguous jurisdictions.
  - AA should coordinate planning for emergency response with appropriate agencies within the jurisdiction to obtain their input and ensure their support. Evidence of this involvement and support should be included in the area plan in the form of a signature sheet signed by representatives of participating agencies, copies of formal approvals by local governing boards, etc.

- Similar consideration should be given to gaining the input, involvement and acceptance by neighboring jurisdictions (including military bases and other government facilities) including the documentation of their support and approval of the area plan. This is important to ensure the acceptance of mutual aid or other emergency resources support mentioned in the area plan. Agreements between or among neighboring jurisdictions should address hazmat incidents and possible funding issues.
  - Appropriate agencies should include police, fire, environmental health, OES, public works, agriculture department, emergency medical service, air pollution, volunteer agencies, municipal water and sewer departments, and municipal governing bodies.
  - AA should set up a series of meetings to ensure regular planning, coordination and information sharing among all emergency response agencies. This could include regular meetings, exercises, newsletters, phone calls, and workshops.
  - Area plan should address formal or informal mutual aid assistance agreements with private businesses or facilities.
  - Procedures for activating/deactivating response agencies should be clearly identified in the area plan. This should be discussed during regular planning meetings with other emergency agencies. It is important not to carry the emergency response into the cleanup and monitoring phase. Procedures need to be specific when it comes to demobilizing the response.
- (c) Procedures to access local, state and federal funding and emergency response assistance.
- The area plan should include a description of potential funding or assistance programs and the procedures necessary to access these programs. A person or persons responsible for accessing funding and assistance should be identified. State funding, federal funding and state/federal funding is available in some cases. Flow charts should be provided to show where to go if the incident is on private property.
  - Guidelines should be developed to capture the information needed to access assistance and funding. A flow chart, decision tree or discussion of the process to obtain funding from the various sources would be helpful to local agencies.
  - Provisions should be made to recover clean-up funds from responsible parties where public funds have been used to clean-up public properties. Include procedures for cost recovery. Procedures should always direct responders to seek reimbursement of response costs from property or equipment owners responsible for the incident.

- (d) Provisions for access to state approved and permitted hazardous waste disposal facilities and emergency response contractors.
- Develop procedures for accessing state approved disposal or treatment sites and emergency contractors during a release incident. Reference any formal or informal agreements for access to these services.
  - Identify state agencies (and phone numbers) with the authority to approve the use of state funded emergency response contractors.
  - Identify disposal and treatment facilities available to the jurisdiction and the types of hazardous waste accepted by these facilities. Include facility contact numbers and the distance the facility is from county boundaries.
- (e) Development of an integrated response management system providing standardized organizational structure, terminology, and procedures for use during any release or threatened release.
- Describe the incident management organization and response procedures utilized by the jurisdiction for emergencies involving the use of the Incident Command System (ICS). State law requires the use of the Standardized Emergency Management System (SEMS) as a means of standardizing response to significant emergencies involving multiple agencies or jurisdictions when (1) the local government emergency operations center is activated, or (2) a local emergency, as defined in Gov. Code Section 8558(c) is declared.
  - An organizational chart or matrix should be used to clearly show functional responsibilities during an incident, cleanup and recovery. Where responsibilities change from one phase to another, provide criteria for making these changes. Area plan should first describe ICS system for jurisdiction and then discuss the various elements and describe how it can be expanded as the incident gets larger.
  - Standard response terminology should be utilized by all agencies and included in the appendix of the area plan.
  - Command structure and decision making responsibilities should be clearly delineated both for field operations and for coordination of all agencies involved in the incident to avoid ending up with multiple response incidents. Criteria should be developed to activate higher levels of response from SEMS.
  - Post-emergency procedures should be identified to clearly define the end of the

response phase and the start of the cleanup and recovery phases. Training at all levels should include a discussion of these procedures. There should be a clear description of the role of private sector response resources (RP's, contractors, disposal facilities, etc.) and agreements (if any) for the utilization of these resources.

- Need to know jurisdictional responsibilities of various agencies so that response termination by one agency is not in conflict with the response termination criteria of another agency.

## **SECTION 2724 - NOTIFICATION AND COORDINATION**

General Comment - The area plan should identify agencies that might be involved in local hazmat responses and then commit to communicating with these agencies to bring together the various representatives with the goal of developing ownership with the area plan and fostering ongoing dialog.

Area plans shall include, but not be limited to:

- (a) Provisions for notification of, and coordination with, emergency response personnel, such as, but not limited to: law enforcement, fire service, medical and public health services, poison control centers, hospitals, and resources for the evacuation, reception and care of evacuated persons.
  - Area plan should identify the State Warning Center, law enforcement, fire, environmental health, AA, emergency coordinator, and CUPA agencies (and all other agencies) contacted and the jurisdictions' plan for coordinating activities with these agencies including regular meetings to ensure effective communication and commitment of participating agencies. An example would be to target key individuals representing the various participating agencies and meet with them regularly. The agency responsible for administering the area plan should coordinate the meetings and take the lead role in preparing changes to the plan or for initiating plan exercises.
  - Procedures (identify the notification process and the numbers to be called) should clearly specify who (agency, etc.) is to be notified, the agency responsible for the notifications, and the information to be collected including cost recovery information. 911 or other local agency 24-hour emergency numbers should be identified along with 24-hour telephone numbers for state OES, CHP, and NRC notification. A process for updating notification telephone numbers should be included.
  - The area plan should include a comprehensive communications plan identifying the means of communication (land line, cell phone, two-way radio, etc.) during an emergency and the key personnel responsible for coordinating communications. A

matrix or diagram showing communications relationships among emergency response agencies should be included.

- The communication's plan should identify the common radio frequencies or other communication measures needed to facilitate inter-agency communication during an incident. A description of the communication methods used by all identified responders should be included.
- (b) Identification and utilization of alternative forms of emergency communications (such as amateur radio services) in the event of a loss of primary communications.
- The communication's plan should include a protocol for identifying alternative forms of communication (local AM radio, RACES, cell phones, ham radios, etc.) and under the conditions the alternate communication will be used. Agreements or other forms of approval for these alternative methods may be identified in the plan. Refer to disaster plan, multi-hazard plan or other plans if this information already exists.
- (c) A responsibility matrix or listing of specific emergency responsibilities of responding organizations. This matrix or listing shall be developed in coordination with the listed responding organizations.
- Identify all local, state, and federal organizations with a role in emergency response including: public health, occupational health and safety, transportation, natural resources, environmental, enforcement, educational, planning and private sector. Prepare a summary matrix listing the organizations and the emergency response activities/responsibilities associated. Be sure the responsibilities and relationships are clear to the reader.
  - The State Contingency Plan and State Emergency Plan may be useful in providing information about state responsibilities in emergency response.
- (d) Provisions for notification to state OES of all reports received pursuant to Article 2 of this subchapter. These notifications shall be submitted, at least monthly, in a format approved by state OES under the California Hazardous Material Incident Reporting System (CHMIRS).
- Identify the agencies responsible for completing and mailing the CHMIRS reports.

## **SECTION 2725 - TRAINING**

- (a) At a minimum, area plans shall establish provisions for training of emergency response personnel in the following areas: (1) emergency procedures for first response to a release or threatened release, (2) health and safety procedures for response personnel, including



those procedures required by Section 2722 of this Article, (3) use of emergency response equipment and supplies, 4) procedures for access to mutual-aid resources, (5) identification of medical facilities capable of providing treatment appropriate for hazardous material incidents, (6) evacuation plans and procedures (7) monitoring and decontamination procedures for emergency response personnel and equipment, (8) first-aid procedures for hazardous material incidents, (9) procedures for informing the public during emergencies, (10) psychological stress that may be encountered during disaster operations.

- Training must be in compliance with Title 8, CCR, and SEMS training requirements including exercises and documentation (by employer) of completed training.
  - Training must meet applicable Title 8, CCR training standards for the level of response activity involved. If the jurisdiction is unsure, it is better to provide the training in question. Refresher training should be included in the training regiment and documented (as per Title 8, CCR, and SEMS requirements).
- (b) Area plans shall include, but not be limited to: (1) provisions for documenting personnel training described in subsection (a) of this section, (2) provisions for joint field or table-top exercises, with affected organizations, with voluntary participation of business representatives.
- The area plan should direct emergency response agencies to maintain training documentation according to SEMS training requirements.
  - The area plan shall include a formal exercise program including tabletop and field exercises among local emergency response agencies. Provisions should be included for the voluntary participation of businesses in the planning and execution of the exercises.
  - The formal exercise program should include a year-by-year schedule or plan of exercises. For example, the first year might include a tabletop exercise, the second year a phase II tabletop, the third year a tabletop phase III, and the fourth year a functional exercise. The program should identify the agency responsible for implementing the program, the agencies involved, and equipment and other resources available to responders.

## **SECTION 2726 - PUBLIC SAFETY AND INFORMATION**

Area plans shall include, but not be limited to:

- (a) Site perimeter security procedures for use during a release.

- Procedures should identify the organization responsible for establishing, maintaining and releasing site perimeter controls. Entry, exit and reentry procedures should be included along with a discussion of media entry.
- (b) Provisions for informing business personnel and the affected public of safety procedures to follow during a release or threatened release.
- Identify ICS positions and agencies responsible for informing businesses and the public. Include specific procedures for agencies to follow when notifying businesses or the public. Identify community notification systems or other measures used by the community to inform citizens of emergencies. Adopt multi-hazard plan approach if already addressed. Include generic public education/information flyer for use by agencies during incident.
- (c) Designation of responsibility for coordinating release of safety information to the public and to the local Emergency Broadcast Service.
- Establish procedures for coordination of information and the personnel responsible (incident commander and public information officer) for release of safety information. The procedures for media release should be clearly defined. Refer to community's disaster plan or multi-hazard plan if already addressed there.
  - Provisions should be made to set up a central clearinghouse for responding to public inquiries concerning emergencies or potential hazards. There should be clear procedures for coordination of information among agencies.
- (d) Provisions for informing medical and health facilities of the nature of the incident and the substance(s) involved in an incident.
- Describe the ICS positions and agencies responsible and the procedures for notification. Refer to the publication: Emergency Medical Response to Hazardous Materials - A Guidance Document for Regional Emergency Medical Services Providers, for specific guidance in reporting incident information.
- (e) Provisions for evacuation plans. Evacuation planning shall provide for the following elements:
- (1) Determination of the necessity for evacuation.
- Who is responsible for making the determination and under what circumstances? Are there criteria for selecting evacuation versus shelter in place? Develop a checklist (see multi-hazard plan) to assist in making the determination.

- (2) Centralized coordination of information with local law, fire, public health, medical, and other emergency response agencies.
  - Provisions should be made to coordinate incident information (by public information officer) among agencies to improve response efficiency and provide for uniform information release to the media and the public.
  - A checklist (see multi-hazard plan) will facilitate the coordination process.
- (3) Timely notification of the affected public, including release of messages prepared pursuant to subsections (c) and (d) of this section.
  - Need to identify the responsible personnel (usually the public information officer) and develop procedures outlining the content and frequency of the notification.
- (4) Properties of hazardous materials, such as quantity, concentration, vapor pressure, density, and potential health effects.
  - This information is provided by the ICS system during incidents involving evacuations, and is made available to the public and medical personnel. The area plan should reference the use and distribution of this information through the ICS system.
  - The plan should reference the discussion of these properties in the training process including exercise scenarios and their simulated evacuations.
- (5) Possible release scenarios.
  - The area plan should include exercises involving simulated evacuation of businesses and the general public. Agencies should incorporate hazmat exercise training which simulate the most likely release scenarios for that community.
- (6) Facility characteristics, topography, meteorology, and demography of potentially affected areas.
  - The plan should include a discussion of these characteristics and their impact on emergency response and decisions involving evacuations or sheltering in place. A checklist would facilitate decision making by reminding emergency responders of these issues and pointing out their relative importance during a response.

- (7) Ingress and egress routes and alternatives.
- The plan should include procedures for determining appropriate routes and incorporate route determination issues in training classes as well as exercises.
- (8) Location of medical resources trained and equipped for hazardous material response.
- Plan should identify all hospitals and other applicable care facilities where injured persons can be cared for. Contact should be made with the facility to ensure they are capable of handling hazmat injuries.
  - The interface among all agencies within your jurisdiction should be tested prior to actual use. At a minimum, each agency should plan and test communications among the hazardous material team, poison control center, and the hospital disaster system prior to an actual incident. Ideally, a primary and secondary communication route should exist between these responders.
- (9) Mass-care facilities, reception areas, and sheltering.
- Identify all possible locations such as schools, auditoriums or other large community facilities where evacuated or injured persons removed from an emergence response incident can be sheltered and cared for. Include a discussion of any verbal or written agreement for the use of the shelters.
  - Identify the key local agency responsible for securing and operating sheltering facilities.
- (10) Procedures for post-emergency period population recovery.
- Identify organizations or agencies and responsible personnel who will provide assistance to evacuated or injured individuals following the incident. See the publication: Emergency Medical Response to Hazardous Materials - A Guidance Document for Regional Emergency Medical Services Providers, for further information.
  - Procedures will need to be established to allow individuals to return to their homes safely and to follow up on any problems that may develop when they return home. County Health Officers generally make this decision as to when to allow individuals to return to their homes. Environmental health provides the follow-up to ensure healthy conditions.

## **SECTION 2727 - SUPPLIES AND EQUIPMENT**

- (a) Area plans shall contain a listing and description of available emergency response supplies and equipment specifically designated for the potential emergencies presented by the hazardous materials that are handled within the jurisdiction of the AA. This information shall be presented to reflect response capability.
- The plan should have a complete list of all available (public and private sector) and usable hazmat response equipment and supplies within the jurisdiction. The list should describe each piece of equipment fully and state its location.
  - The plan should specify how to gain access to the equipment on a 24-hour basis and the personnel familiar with the equipment's operation and location. The plan should identify who is responsible for updating the equipment list.
  - The plan should assess the jurisdiction's response capabilities based on the listed equipment resources. Jurisdictions should be realistic in their estimates of what they and their equipment are capable of doing during a response. Regular meetings and exercises among emergency response agencies can better define these capabilities.
- (b) Area plans shall outline the provisions for regular testing, if applicable and proper maintenance of emergency response equipment under the direct control of the county or the city.
- The plan should identify the agency responsible for the testing and maintenance of listed equipment including the names and phone numbers of responsible personnel, and the agency maintaining the testing and maintenance records.
  - Recommendations for equipment and supply additions and deletions should be listed and discussed to address future equipment needs and to ensure the continued availability of appropriate resources.

## **SECTION 2728 - INCIDENT CRITIQUE AND FOLLOW-UP**

Area plans shall describe provisions for the critique and follow-up of major incidents of a release or threatened release. The critique shall include an interagency meeting to evaluate the response, to improve future response, and to determine if any area plan revisions are required.

- Post-incident analysis procedures should be developed for all major incidents. Procedures should include the purpose of the analysis and a full review and discussion of incident

characteristics (chemical information, incident report, photos, incident command, agencies involved, clean-up, follow-up actions, good and weak points of incident, etc.).

- Jurisdictions should include the public during critiques of significant incidents where the community has been impacted (evacuations, etc.). Public agencies have a responsibility to report chemical releases to the public and the critique is a good opportunity to discuss the incident publicly.

**INFORMATION REQUIRED BY SECTION 25503(e), HEALTH AND SAFETY CODE  
TO BE SUBMITTED WITH AREA PLAN:**

1. Provisions for a plan for on-site inspections of businesses subject to Division 20, Chapter 6.95, Health and Safety Code.
  - Include a description of the AA's disclosure program, inspection frequency and the total number of businesses subject to the program. Indicate the number of businesses submitting chemical information to the AA. The jurisdictions CUPA application contains most if not all of this information.
2. Provisions for managing data collected from businesses subject to Division 20, Chapter 6.95, Health and Safety Code.
  - Describe the data management system utilized by the AA to store data collected from businesses. Indicate whether the system is based on hard copies or electronic and, if electronic, the type of hardware and software used. Describe agency procedures for obtaining new business information and annual inventory information from businesses. Describe how the data is made available to the public and emergency responders.